



November 20, 2010

Amended PCB Removal Plan: City Square

AMENDMENTS TO PCB REMOVAL PLAN

INTRODUCTION:

NASDI, LLC, has changed sub-contractors at the above-mentioned site from Clean Venture, Inc. to DEC-TAM Corporation. The main reason is to improve the paint removal process, expedite the work and increase production. The certification from DEC-TAM that they have read the City Square Cleanup Plan and EPA approval letter and agree to comply with its conditions is attached as required by the EPA approval.

The methods for removing PCB impacted stripes, collecting, storing and disposing of the PCB bulk product and PCB remediation waste remain as described in the original contractor work plan, with the exception of the configuration of the containment. The amended revised containment procedure is describes as follows:

OVERALL CHANGES:

The original work plan had work areas being done in 20' x 6' containments throughout the garage with an extensive number of containments. The revised work plan will contain much larger areas of the garage excluding the roof. Work will be done under a negative enclosure as provided in the original with removal methods utilizing similar equipment with HEPA Shrouds to control dust. The roof area will be done in accordance with original plan.

NASDI feels that these changes will:

- Provide better control of the work by only have a limited number of work areas under containment.
- Allow for a larger work environment for personnel and equipment
- Expedite the process of removal
- Ensure that Consultant reviewing and testing less number of areas and hopefully allowing for a more thorough and detailed visual of larger area as opposed to hundreds of small areas.
- Allow for Consigli, NASDI and Consultant to provide oversight of less areas and verify work practices as designed and planned.

In summary, our efforts put forth are meant to improve the process of removal and ensure a safe work environment for employees as well as protect the public.

Submitted By: Michael F. Tibert
Director of Environmental Health & Safety


DEC-TAM

50 Concord St. North Reading, Massachusetts 01864

Phone 978-470-2860
Fax 978-470-1017

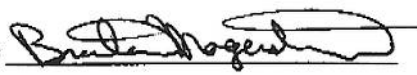
November 20, 2010

Mr. Mike Tibert
North American Site Developers, Inc.
1365 Main Street
Waltham, Massachusetts 02451

**RE: PCB Paint Line Stripping Remediation
Worcester City Square
Worcester, Massachusetts**

Dear Mr. Tibert:

I, Brent Morgenstern, representing DEC-TAM Corporation have read and understood the PCB Cleanup and Disposal Approval Letter dated August 2, 2010 addressed to Mr. Donald Birch from the United States Environmental Protection Agency. By signing this acknowledgment form, I hereby agree to all conditions set forth in this document, including but not limited to EPA requests and attachments. I fully understand that I must comply with all requirements set forth in the Notification Letter.

Signature Printed Name Brent MorgensternDecTam CorporationSales EstimatorDate 11/20/2010



NASDI

I, Michael Tibert, representing NASDI, LLC have read and understood the PCB Cleanup and Disposal Approval Letter dated August 2, 2010 addressed to Mr. Donald Birch from the United States Environmental Protection Agency. By signing this acknowledgment form, I hereby agree to all conditions set forth in this document, including but not limited to EPA requests and attachments. I fully understand that I must comply with all requirements set forth in the Notification Letter.

Signature 

Printed Name Michael Tibert

Date 11/20/2010

MATERIAL STORAGE AND HANDLING PROCEDURES

PCB BULK PRODUCT WASTE MATERIAL

PCB bulk product waste (e.g. line stripping and associated porous materials) shall be handled a manner to minimize the breakdown of these materials into fine dust or powders.

Following removal activities:

- These materials shall be placed in the DOT approved containers on a daily basis.;
- PCB waste and PCB-containing items shall be stored for disposal in accordance with 40 CFR 761.40 and 40 CFR 761.65.;
- Containers shall be clearly marked as PCB-containing waste materials.;
- Lined and covered containers containing PCB materials will be marked with appropriate designations & labels, as stated in the 40 CFR 761.65(c)(1).
- All containers and PCB-contaminated materials will be non-liquid materials;
- A tarp shall be used to prevent spillage onto the floor of the storage area. When not in use, the containers will remain covered by both bow and tarps.
- All areas containing PCB waste must be secured on a daily basis.

Any dried and brittle PCB bulk product wastes require additional care, such as the use of a HEPA-filtered vacuum operating while removing the material, to prevent the inadvertent release of PCB dust or powder into the environment

Filled containers will be staged on the site in a secure area, pending shipment for disposal. All proper signage shall be on the storage container. Location of trailer/container shall be placed at the General Contractor's direction within construction fenced area.

PCB REMEDIATION WASTE

The primary PCB remediation wastes generated by this abatement project will be limited to PCB decontamination materials from the decontamination of the concrete, and personnel protective equipment used by workers during decontamination and removal activities. These materials will be placed directly into lined containers for disposal.



50 Concord St. North Reading, Massachusetts 01864

Phone 978-470-2860

Fax 978-470-1017

DISPOSAL

Disposal of all waste shall be in accordance with applicable state and federal regulations and sent to a licensed facility that will receive and retain PCB bulk product waste and PCB remediation waste, in accordance with EPA regulations under 40 CFR 761.61 and CFR 761.62.

All PCB bulk product waste and PCB remediation waste removed from the site will be kept separate from other ordinary construction waste streams that the contractor may generate. Copies of all manifests, waste shipment records, certificates of disposal, and any other documentation will be provided to Consultant as proof of proper disposal of waste. Furthermore, copies of all manifests shall be provided to the EPA as part of the final summary report.

PCB bulk product and PCB remediation wastes will be stored according to applicable EPA TSCA regulations. Dec-Tam Corporation shall ensure compliance with storage and marking requirements described in 40 CFR 761.40 and 40 CFR 761.65. The contractor shall minimize dust emissions inside the enclosure, and also ensure that no visible emissions of dust will occur outside the enclosure during the disposal of PCB bulk product, and PCB remediation wastes into appropriate disposal containers. This will be accomplished by filling containers within the work enclosure.

The PCB bulk product waste and PCB remediation waste shall be disposed of in accordance with 40 CFR 761.62 and 40 CFR 761.61 (b), respectively, at an approved landfill for such disposal. Dec-Tam Corporation shall submit the name of the landfill(s) with appropriate documentation to verify that it is capable of accepting PCB waste in accordance with these requirements.

If PCB bulk product waste requires TCLP analysis prior to disposal, as required by the disposal facility, sampling and analysis will be conducted in compliance with applicable regulations and disposal facility criteria. The disposal facility is expected to be Chem Waste Mgmt in Model City, NY.

DECONTAMINATION AND REMOVAL PROCEDURES

Dec-Tam Corporation will obtain proper permits and conduct work in compliance with all applicable regulations, including the TSCA, and RCRA and any other applicable federal, state, and local laws. Abatement procedures for the work shall consist of the removal of specified PCB-containing materials.

LINE STRIPPING REMOVAL

The PCB-containing line stripping at the Garage will be removed using the following procedures.

- Located area to abate and verify that proper protection is in place
- Pneumatic chipping, shot blasting, and scarifying shall be used to remove line stripping and adjacent concrete in accordance with PCB Management Plan. All equipment shall HEPA shrouded to control dust.
- Moisten porous building materials with water using a low pressure hand held sprayer(e.g. garden sprayer) and maintain moisture content to reduce dust levels
- Clean up dust and residues with HEPA-filtered vacuuming and/or wet wiping techniques.

Upon completion of the cleaning, the Owner's Consultant will conduct visual inspections to verify the completeness of the cleaning effort. The line stripping will be disposed as PCB bulk product waste. All testing shall be in accordance with EPA Regulations and EPA Approved PCB Management Plan and Project Specifications.

DECONTAMINATION OF FIELD EQUIPMENT AND PROPER DISPOSAL OF DECON WASTE.

Field equipment, including PPE, will be decontaminated or disposed of with other PCB waste shall be in accordance with 40 CFR 761.79(c)(2). Generally, PPE and other disposable items will be managed as PCB waste, movable items will be decontaminated using an appropriate and commercially available cleaning solvent. Since only the items that have contacted PCB surfaces will require decontamination, wiping with a solvent soaked rag is expected to be sufficient. No liquid decontamination waste is expected to be generated. Rags will be disposed of with other PCB waste. Record keeping shall be in accordance with currently regulatory standards.